

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**SUPPLEMENTAL DECLARATION OF DAVID SEIDEL IN SUPPORT OF
PLAINTIFFS' MOTION FOR LEAVE TO AMEND**

I, David Seidel, declare as follows:

1. I am an associate at the Joseph Saveri Law Firm, LLP (“JSLF”), counsel for Plaintiffs Jessica Jones and Christina Lorenzen (“Plaintiffs”) in this matter. I am a member in good standing of the State Bar of California and have been admitted pro hac vice in this Court. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to the matters described below.

2. Attached as **Exhibit 1** is a true and correct copy of a document in this case, Bates labeled VAR00314244. This document was produced by Defendant Varsity Brands, LLC on June 30, 2021.

3. Attached as **Exhibit 2** is a true and correct copy of an excel spreadsheet, Bates labeled GS-007732, that has been converted to PDF format. This spreadsheet was produced in native form by third party Goldman Sachs & Co., LLC on October 6, 2021, in the related action *Fusion Elite All Stars et al v. Varsity Brands, LLC et al*, 2:20-cv-02600-SHL-cgc. I have converted the excel spreadsheet into a PDF so that it can be attached to this declaration.

4. Attached as **Exhibit 3** are the document requests Plaintiffs served on Charlesbank on March 26, 2021.

5. Attached as **Exhibit 4** are the document requests Plaintiffs served on Bain on March 26, 2021.

6. Charlesbank and Bain produced the vast majority of their documents on April 1, 2022, just seventeen days before the end of discovery.

7. Charlesbank produced 516,531 of its 546,147 total pages on April 1, 2022. That amounts to roughly 94.6% of Charlesbank's total production being produced on April 1, 2022.

8. Bain produced 148,831 of its 156,568 total pages on April 1, 2022. That amounts to roughly 95.1% of Bain's total production being produced on April 1, 2022.

I declare under penalty of perjury that the foregoing is true and correct. Executed September 16, 2022 in San Francisco, California.

/s/ David Seidel
David Seidel